

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

STANDARD FIRE INSURANCE COMPANY,	)	
Plaintiff	)	
	)	
v.	)	CIVIL ACTION NO. 04-12244GAO
	)	CONSOLIDATED
CROSBY YACHT YARD, INC. AND	)	
OYSTER HARBORS MARINE, INC.,	)	
Defendants	)	

**MOTION OF THE PLAINTIFF, STANDARD FIRE INSURANCE COMPANY, FOR LEAVE  
TO FILE A REPLY MEMORANDUM TO DEFENDANT, CROSBY YACHT YARD'S,  
OPPOSITION TO MOTION TO AMEND**

NOW COMES the Plaintiff in the above captioned matter and pursuant to U.S. District Court, Local Rule 7.1(B)(3) hereby files the instant Motion for Leave to File a Reply Memorandum to Defendant, Crosby Yacht Yard's Opposition to Motion to Amend. In support thereof, the Plaintiff submits the following:

**BRIEF FACTUAL SUMMARY**

1. On or about January 16, 2007 after conferring with the attorneys of record on this matter, the Plaintiff filed a Motion to Amend Complaint to Add Additional Plaintiff.
2. On the last day to do so, Defendant Crosby Yacht Yard, filed an Opposition to Plaintiff Standard Fire Insurance Company's Motion to Amend Complaint.
3. Plaintiff now seeks to submit the attached Reply Memorandum to Crosby Yacht Yard's Opposition to further assist the Court in ruling on the original Motion to Amend Complaint.
4. Plaintiff further seeks to submit the attached Reply Memorandum to reply and refute the legal authority cited by Crosby Yacht Yard in their Opposition.

**ARGUMENT**

This Court should Allow Plaintiff's Motion for Leave to File Reply Memorandum as a terse supplement to aid and clarify the issue at bar for the Court. Pursuant to Local Rule 7.1(B)(3) reply memoranda shall be filed only with leave of court. Accordingly, Plaintiff seeks to file a brief Reply Memorandum (attached hereto) to distinguish Defendant, Crosby Yacht

Yard's Opposition and clarify the issue in front of the Court.

CONCLUSION

For the foregoing reasons, the Court should ALLOW Plaintiff's Motion for Leave to File Reply Memorandum and deem ALLOWANCE of this Motion as service of Plaintiff's Reply Memorandum upon the other Parties hereto.

For the plaintiff,  
Standard Fire Insurance Company,  
By its attorney,

**REGAN & KIELY LLP**

/s/ John D. Blaisdell  
Robert E. Kiely, Esquire (BBO #556640)  
John D. Blaisdell, Esquire (BBO #652423)  
88 Black Falcon Avenue, Suite 330  
Boston, MA 02210  
(617)723-0901

DATED: February 5, 2007

**Certificate of Service**

I, John D. Blaisdell, attorney for the Plaintiffs, Standard Fire Insurance and Paul Kaneb hereby certify that on February 5, 2007 I served Plaintiff's Motion for Leave to File Reply Memorandum by electronic file notification upon all counsel of record:

/s/ John D. Blaisdell  
John D. Blaisdell